

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

DAVID B. POPKIN MOTION NUMBER 2

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Respectfully submitted,

N20121MOTION2

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On February 21, 2012, the Postal Service filed objections to Interrogatories DBP/USPS-34, 35, and 40 which were filed on February 9, 2012. The objection to Interrogatories DBP/USPS-34 and 35 are the same and claim that these Interrogatories are not relevant to the issues raised by the request in the instant docket and are within the scope of the Annual Compliance Determination – Docket ACR2011.

The current Docket proposes to change the service standards for single-piece First-Class Mail and the EXFC program is designed to measure the compliance with the new service standards. The ability of the EXFC program to accurately measure the performance of the Postal Service to meet these new standards is relevant.

The fact that these Interrogatories may also be relevant in Docket ACR2011 is irrelevant although I have no objection to the Chairman utilizing the subject of these two Interrogatories in a request.

The text of these two Interrogatories is as follows:

DBP/USPS-34      The following Interrogatory refers to the Statement of Work for the TTMS/EXFC dated December 26, 2008, as provided in response to my Interrogatory DBP/USPS-21.

[a] The third sentence of the first paragraph in Section 2.2.3.3 on Page 9 allows the dropper to induct mail prior to the induction date if the CPMS listing shows a last pickup time which is later than the last pickup time shown on the label on the blue collection box. Please provide an example of what this sentence means by giving the scenario that would take place indicating the time that might appear on the collection box and the time that might appear on the CPMS listing and using days of the week assuming that no holidays are involved.

[b] The final sentence of the same paragraph indicates that the supplier may change the induction date under this scenario to the next date. Please incorporate the conditions under which this would take place using the days of the week and the conditions requested in subpart [a] above.

[c] Section 2.2.5.1.2 on Page 12 seems to be identical to the above referenced section. Please confirm or explain.

[d] What information and/or restrictions are provided to the dropper as to the location of the collection point and time window that may be utilized for a given mailing. Please indicate the source of the data and confirm or explain that the data appearing on the blue collection box label will not be known until the dropper arrives at the box.

[e] Assume that the CPMS shows a final weekday collection time of 3 PM and the label on the blue collection box shows a final weekday collection time of 2 PM. What action will be taken by the dropper and subsequently by the supplier if the dropper arrives at the collection point on Wednesday at the following times:

[1] 1 PM                      [2] 2:10 PM

[f] Assume that the CPMS shows a final weekday collection time of 2 PM and the label on the blue collection box shows a final weekday collection time of 3 PM. What action will be taken by the dropper and subsequently by the supplier if the dropper arrives at the collection point on Wednesday at the following times:

[1] 1 PM [2] 2:10 PM

[g] Please confirm or explain that a number of the collection points are scheduled for more than one collection time on a given day. What are the guidelines, if any, that exist in utilizing a collection point that has multiple collection times or can the dropper choose any drop time between 5 AM and 30 minutes prior to the final collection time?

[h] Please confirm or explain that a number of the collection points are scheduled for a weekday final collection time of later than 6:30 PM and that these boxes should also have a collection time shortly after 5 PM [POM Section 322.341]. What are the guidelines, if any, that exist in utilizing a collection point that has a weekday collection time of 6:30 PM or later?

[i] If the response to subparts [g] and/or [h] above indicate that there are no guidelines for either or both of these two scenarios, please confirm or explain that the on-time results would be skewed in favor of the Postal Service in subpart [g] since there would be two or more opportunities to collect the mail and skewed against the Postal Service in subpart [h] since the mail would arrive at the plant later than with a 5 PM or earlier collection.

[j] Please advise the guidelines, if any, that exist to take into account each of the following characteristics to ensure that the results are representative of the conditions that exist in the overall mail profile:

- [1] Early collection times vs. late collection times
- [2] Early arrival time at the plant vs. late arrival time at the plant
- [3] Multiple collection times vs. a single collection time
- [4] Using an early vs. late collection at a box with multiple collections

DBP/USPS-35 [a] Please advise the approximate number of EXFC droppers and reporters that are presently being utilized.

[b] For reporters, what is the approximate percentage breakdown between those that receive mail delivery at a post office box vs. those that receive delivery at a residence address vs. delivery at a business address?

The objection to Interrogatory DBP/USPS-40 is based on a claim of irrelevance to any material issue and excessive burden.

The ability of mailers to have access to a local BMEU is relevant to the change of service standards. The service standards may change if a mailer is forced to bring their mail to a different entry point. That entry point may have a different processing center and associated service standards; it may also have an earlier entry time so the mail will be delayed. The object of Interrogatory DBP/USPS-40 is to determine whether the other 49 states of the country were affected as drastically as New Jersey was. Furthermore, any claim of excessive burden must quantify the level of burden and the current objection did not.

The following is the wording of that Interrogatory:

DBP/USPS-40 Please refer to your response to Interrogatory DBP/USPS-30.

[a] Prior to the consolidation of BMEUs to 40 locations in New Jersey, approximately how many locations in New Jersey permitted the entry of the various categories of bulk mail?

[b] Prior to the consolidation of BMEUs to 1000 locations in the other 49 states, approximately how many locations in these 49 states permitted the entry of the various categories of bulk mail?

[c] Which ever list is shorter, please advise which of the 49 other states either experienced a consolidation of BMEUs or did not experience a consolidation of BMEUs and still permit the deposit of such mail at all facilities in the state?

[d] Over what time frame did these consolidations take place?

For the reasons stated, I move to compel responses to these Interrogatories which will lead to appropriate discovery related to the Postal Service request.